Summary of Public Comments and Staff Responses

Salt Management Strategy
Finalized on February 22, 2018

The Virginia Department of Environmental Quality (DEQ) sought public comments from January 17 – February 16, 2018 on (1) its overall plans to develop a Salt Management Strategy (SaMS); (2) a technical report on the Impacts of Salt on the Environment, Infrastructure and Property; and (3) interest to serve as a member of the Stakeholder Advisory Committee (SAC).

A total of seven written communications were received during the public comment period. Six of these were either new or confirming expressions of interest to participate in the SAC. DEQ had already received many volunteers to participate in the SAC in response to earlier stakeholder communications.

The additional comment was received from Russ Short of Northern Virginia chapter of Trout Unlimited, and pertained to an aspect of the technical report on salt impacts. Mr. Short's comment and the DEQ staff response follows:

Mr. Short wrote "Since the TMDLs are based on exposure, there is a need to have more detail included on the exceedance timelines. While whisker plots are nice, implementing a monitoring program and BMPs tied to the strategy requires a better understanding of the salt discharges."

Staff Response: Mr. Short's recommendations for an effective monitoring program are appreciated and will benefit the overall Salt Management Strategy. Staff encourages Mr. Short to bring this suggestion to stakeholder discussions on the water quality monitoring objective for the Salt Management Strategy. A better understanding of salt discharges will help implement the strategy and inform the effectiveness of Best Management Practices (BMPs).

The referenced box and whisker plots in Figure 6 of the report titled "Salt Management Strategy: Environmental Impacts and Potential Economic Costs and Benefits of Improved Management Practices in Northern Virginia" was included to show the increasing trend in average annual chloride concentrations from 1990 to 2014. While this figure does not provide information on the magnitude or timeframe of chloride pulses after deicing salts are applied, it does communicate the concerning, increasing trend in annual average chloride concentrations. Figures 4 and 5 provide observed specific conductance measurements that are measured at 15 minute intervals and illustrate the magnitude and duration of salt discharges. While specific conductance is not a direct measure of chloride or other salts, it provides a surrogate measure for the magnitude of dissolved solids such as salts. Including specific conductance and measurements of salt concentrations in a monitoring program will provide a picture on the instream impact of salt application and the stormwater discharges of those salts. However, staff does acknowledge that the connection between salt application rates, runoff, and instream impacts are an unknown at this point. Therefore, staff encourages discussions on how to best understand these relationships.